

Deborah MartinNorcross <dmnorcross@martinnorcross.com>

Thu, May 29, 2008 at 6:30

PM

To: "numoh@umohlaw.com" <numoh@umohlaw.com>

Cc: "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>

Dear Uwem:

On May 19, I asked you to provide alternative dates for Plaintiff's deposition given her unavailability during our preferred range of dates. You did not respond to that request, and have not supplied any dates. You also never responded to our offer to make our clients available for depositions during the week of June 2, dates which we have consequently advised our witnesses that they need not continue to hold.

Accordingly, attached is our clients' Re-Notice of Deposition setting Plaintiff's deposition on behalf of our clients for June 9. We understand that the Trump defendants will depose her on June 11.

Deborah

MartinNorcross LLC
60 Marion Road West
Princeton, NJ 08540
(609) 249-5860
(609) 945-3912 Fax
dmnorcross@martinnorcross.com



05-29-08.ReNoticeOfDeposition.Plaintiff.doc

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Deborah MartinNorcross <dmnorcross@martinnorcross.com>

Fri, Jun 6, 2008 at 10:22 AM

To: "numoh@umohlaw.com" <numoh@umohlaw.com>

Cc: "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>

Please confirm this morning that your client will appear for her deposition on June 9 and June 11.

Thank you.

Deborah

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Fri, Jun 6, 2008 at 5:24 PM

To: Deborah MartinNorcross <dmnorcross@martinnorcross.com>

Cc: "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>, chidieze@yahoo.com

Good day--

Mr. Eze tried to reach the parties earlier today to let them know we need more time to produce Ms. Mann for depositions. She is not available for June 9 and 11. I'm sorry for any inconvenience. Can the parties please give alternative dates.

Thank you
Uwem I. Umoh
255 Livingston Street,
4th Floor
Brooklyn, NY 11217
718.360.0527
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